



Oregon

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January 26, 2016

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Subject: EMPC Reporting for the Rhone-Poulenc Site
RP-Portland Site
ECSI #155

Dear Mr. Dearden:

The Oregon Department of Environmental Quality (DEQ) received the January 14, 2016 *Response to December 21, 2015 Letter-Response to DEQ Comments on Outfall 22B IRAM Performance Monitoring Second Quarter 2015 Report RP-Portland Site ECSI #155*.

DEQ received the *Outfall 22B IRAM Performance Monitoring Second Quarter 2015 Report* on September 22, 2015, documenting the 2015 second quarter results of water discharge sampling and analysis from the Outfall 22B system, and subsequently issued comments in our October 8, 2015 and December 21, 2015 letter to StarLink.

StarLink's January 14, 2016 response does not appear to fully address DEQ's request. DEQ requests that StarLink fully address our comments below regarding Specific Comment 3 from DEQ's October 8, 2015 letter. DEQ's original comment, followed by StarLink responses are provided below for context. Please submit the requested documentations within 30 days.

DEQ October 8, 2015 Specific Comment No 3

Table 5: Outfall 22B 2nd Quarter 2015 IRAM Performance Monitoring-Detected Results Summary. *The data validation report does not provide rationale for reporting estimated maximum possible concentration (EMPC) results as "U" (The constituent was analyzed for, but was not detected above the reported sample quantitation limit). As previously discussed with StarLink, DEQ generally follows EPA guidance regarding the use of qualified data in risk assessments. The most commonly encountered data qualifier is J, indicating an estimated value. J-qualified data are considered the same as unqualified data for risk assessment purposes. Similarly, EMPC qualified data are also considered the same as unqualified data for risk assessment purposes.*

Please revise the report to include updated summary tables that appropriately indicate EMPC detections. DEQ also requests that StarLink confirm in an e-mail or other written response that EMPC values were included in all site risk assessments, and are also presented correctly in the RI/SCE Report. Please clearly indicate if the value presented as valid sampling data is an EMPC detected value in future submittals to DEQ.

StarLink's November 6, 2015 Response: EPA guidance for laboratory reporting was followed in the report. The results that DEQ referred to were presented as reported by the laboratory (Vista Analytical Laboratory, El Dorado Hills, California). The laboratory routinely reports PCDD/F, OCI and PCB congener results with EMPC values but either as non-detect (ND) or as detected (results with or without EMPC values). No changes were made to the EMPC reported results during validation and results were reported as received from the laboratory. Table 5 is a summary of "detected" parameters; therefore listing laboratory results reported as ND in Table 5 is not appropriate. Laboratory results with EMPC non-detect values and EMPC detected values were reported in Table 6. Similarly, in the RI-SCE and risk assessment reports EMPC non-detect values were treated as non-detects, EMPC detected values were treated as detects.

DEQ December 21, 2015 Response: DEQ contacted Vista Analytical to confirm Golder's understanding regarding how Vista Analytical reports EMCP results. Based on our conversation with Vista and subsequent conversation with Kent Anglos (Golder), it is DEQ's understanding that Vista Analytical does not in fact report EMPC values as either non-detect or as detected for specific dioxin/furan congeners, PCB congeners or organochlorine insecticides. Rather, Vista Analytical chooses to always report these EMPC values as non-detect. Other laboratories choose to report EMPC as detected values with an EMPC flag. DEQ guidance clearly states that EMPC results are considered the same as unqualified data for risk assessment purposes, and therefore must be reported as such.

A revised report which includes updated summary tables that appropriately notes EMPC results must be submitted to DEQ within 30 days. Also, future submittals to DEQ must clearly indicate EMPC values and evaluate data consistent with DEQ guidance.

Based on Golder's statements regarding previous submittals, it appears that StarLink may have submitted reports inconsistent with DEQ EMPC guidance. To address this issue, summary tables of all groundwater data with EMPC results that were incorrectly identified as "non-detects" must be presented within 30 days so that DEQ can assess the potential impacts to the evaluation of groundwater transport of contaminants to the river. Further discussions may be necessary to determine whether or not additional evaluation of the groundwater data is needed and if additional reporting of soil/sediment data will be required.

StarLink's January 14, 2016 Response: On behalf of StarLink Logistics, Inc. (StarLink), this letter transmits Estimated Maximum Potential Concentration (EMPC) results for the Outfall 22B IRAM Performance Monitoring Second Quarter 2015 sampling and groundwater monitoring EMPC results.

Please note the following:

- For the Outfall 22B 2nd Quarter 2015 sample results, the EMPC results provided in the attached table were reported in Table 6 of the report but were not specifically identified as "EMPC" results. We will continue to report and clearly identify "EMPC" results in future reports.
- We are providing dioxin/furan groundwater EMPC results in the attached "Groundwater EMPC Results" table. These data were not reported in the Appendix C tables in the RI/SCE Report¹ which was consistent with the approved work plan and QAPP relevant at the time.

DEQ Response: StarLink's response does not fully address the deficiencies identified by DEQ. Specific direction is provided below regarding the reporting of the recent Outfall 22B water data, and reporting of historical groundwater data.

- 1) Outfall 22B 2nd Quarter 2015 Sample Results. EMPC results must be reported in the summary of detected results (i.e. Table 5) and in the validated laboratory results (i.e. Table 6). If SLLI prefers, the title of Table 5 may be changed to Detected and EMPC Results Summary. In this quarterly report and all future data submittals, EMPC results must be reported with the detected and validated laboratory results with an EMPC flag denoting the laboratory identified the value as an EMPC result.
- 2) Historical Groundwater Data. StarLink provided tables of dioxin/furan groundwater EMPC data in the January 14, 2016 submittal that were not previously reported in Appendix C tables of the RI/SCE Report. However, the table does not identify EMPC data for the individual congeners that were reported "U" (non-detect) in the Appendix C tables, and therefore does not fully address DEQ's request for summary tables of all groundwater data with EMPC results that were identified as "non-detect".

Given the amount of data that appears to be affected by this request, the submittal may be limited to only groundwater data collected from off-property wells post January 1, 2000, and also can be limited to dioxin/furan and OCI data. The off-property portion of the data set will likely be sufficient for DEQ to re-assess groundwater transport of contaminants to the river.

DEQ notes that this data will need to be compiled and tabulated in order for StarLink to comply with DEQ's directed modification of the November 2015 *Revised Off-Property Screening Level Human Health Risk Evaluation (Off-Property HHRA)*. Specific Comment 9 of our January 7, 2016 comment letter on the Off-Property HHRA directed StarLink to present and screen all EMPC flagged data. This must include all data that was reported by the laboratory as an EMPC result regardless of whether or not the laboratory reported the result as a "non-detected" value.

Please provide the revised summary tables with 30 days and feel free to contact me at 503 229-6748 if you have any questions.

Sincerely,



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DEQ NWR Cleanup Program

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ECSI #155

